

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of)	
)	
Proposed Changes in the Commission's)	ET Docket No. 03-137
Rules Regarding Human Exposure to)	
Radiofrequency Electromagnetic Fields)	

To: The Commission

COMMENTS OF GLOBAL RF SOLUTIONS d.b.a. RF SOLUTIONS LLC

Background

RF Solutions LLC is respectfully submitting the following comments for the FCC to consider during the Commission's review of rules regarding Human Exposure to RadioFrequency Electromagnetic Fields. These comments are based on the sampling of several hundred rooftop communications sites.

Discussion

1. Routine Evaluations and Categorical Exclusions

Currently the determination of a licensed transmitter sites requirement for a Routine Evaluation has been determined using OET Bulletin 65, appendix A, Table 2. Although many Licensees are diligent in ensuring their sites are compliant with FCC guidelines. It is also apparent that many sites have not been evaluated as major changes to those sites have been occurring. Sites that may have been "Categorically Excluded" from routine evaluations during initial commissioning have since increased the cumulative total power output of the site as the system capacity needs have required it. These increases in many cases have placed sites that were formerly "Categorically Excluded" from a routine evaluation into the "Routine Evaluation Required" category.

Based on the assessment of several hundred communications sites, we would recommend that the separation distance from publicly accessible areas be reduced as well as the total site output power required to perform a required "Routine Evaluation".

2. Special Considerations for Occupational Use

The Commissions RF guidelines incorporate two tiers of exposure limits. The less restrictive tier is intended for workers that can exercise control over their exposure. After interviewing workers and site managers at several hundred

existing communications sites, we have **never** encountered any workers that have been given any written or verbal instructions on methods for personnel to limit or control their Exposure to Radiofrequency Electromagnetic Energy. If appropriate training is not practical or the site cannot demonstrate a truly “Occupational/Controlled” environment to ensure that workers with access to the site are not aware of their exposure or methods to control it that the more restrictive “General Population/Uncontrolled” limits should apply in such circumstances. Proper appropriate signage for warning personnel is seldom posted in a correct manner at most sites.

Conclusion

Although many FCC Licensees have been diligent in ensuring their sites are compliant with rules regarding Human Exposure to RadioFrequency Electromagnetic Fields, it is apparent that several others are not. It is also seems very apparent that personnel granted access to communications sites have inadequate knowledge that would enable them to control their exposure to RadioFrequency Electromagnetic Fields.

Marvin E. Wessel
RF Solutions LLC
1990 N Alma School Road #122
Chandler, AZ 85224
rfsolutions@cox.net
www.grfs.net